

# Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com  
Suite 400  
333 SW Taylor  
Portland, OR 97204

January 8, 2016

## *Via Electronic Filing*

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High St. SE, Suite 100  
Salem OR 97301

Re: PACIFICORP, dba PACIFIC POWER  
2017-2021 Renewable Portfolio Standard Implementation Plan  
**Docket No. UM 1754**

Dear Filing Center:

Enclosed for filing in the above-referenced docket, please find the Petition to Intervene of the Industrial Customers of Northwest Utilities.

Thank you for your assistance. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Jesse O. Gorsuch  
Jesse O. Gorsuch

Enclosure

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1754**

In the Matter of )  
 )  
PACIFICORP, dba PACIFIC POWER ) PETITION TO INTERVENE OF THE  
 ) INDUSTRIAL CUSTOMERS OF  
 ) NORTHWEST UTILITIES  
2017-2021 Renewable Portfolio Standard )  
Implementation Plan. )

Pursuant to ORS § 756.525, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status such as the Commission is authorized to grant. In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:  
  
Industrial Customers of Northwest Utilities  
818 SW 3rd Ave., #266  
Portland, OR 97204
2. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to this proceeding should be served on ICNU’s attorneys and consultant at the following addresses:

Jesse E. Cowell  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: jec@dvclaw.com  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

Bradley G. Mullins  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: brmullins@mwanalytics.com  
Telephone: (503) 954-2852  
Facsimile: (503) 241-8160

Tyler C. Pepple  
Davison Van Cleve, P.C.  
333 S.W. Taylor, Ste. 400  
Portland, OR 97204  
E-Mail: tcp@dvclaw.com  
Telephone: (503) 241-7242  
Facsimile: (503) 241-8160

3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of PacifiCorp (or the “Company”), as indicated on Attachment A.

4. On December 29, 2015, PacifiCorp filed its 2017-2021 Renewable Portfolio Standard (“RPS”) Implementation Plan, which details how the Company intends to meet its RPS requirements in the years 2017-2021. Under ORS 469A, electric utility companies must develop an implementation plan for meeting the RPS, which requires that at least 15 percent of electricity sold must come from qualifying resources in calendar years 2017-2019, and 20 percent in calendar years 2020-2021. The Company plans to meet its RPS targets during this period with a mix of bundled renewable energy certificates (“RECs”) from existing Oregon-eligible resources and RECs from resources under development that are anticipated to be Oregon RPS-eligible. ICNU has a substantial interest in PacifiCorp’s RPS plan, as the costs of compliance could rise significantly, and may be included in PacifiCorp’s rates paid by ICNU’s members.

5. ICNU represents the interests of a number of large electric customers served by PacifiCorp in Oregon. ICNU’s intervention in this proceeding will assist the

Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 8th day of January, 2016.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Jesse E. Cowell

Jesse E. Cowell

Tyler C. Pepple

333 S.W. Taylor, Suite 400

Portland, Oregon 97204

(503) 241-7242 phone

(503) 241-8160 facsimile

jec@dvclaw.com

tcp@dvclaw.com

Of Attorneys for the Industrial Customers of  
Northwest Utilities

## ATTACHMENT A

### INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES

Air Liquide  
Air Products  
AkzoNobel  
Alcoa  
Amcor Rigid Plastics  
Axiall, Inc.  
#Boeing  
#Boise Cascade, Inc.  
Certain Teed Gypsum & Ceiling Manufacturing (BPB)  
ConAgra Foods  
Dyno Nobel, Inc.  
Emerald Performance Materials  
Evraz, Inc.  
#Freres Lumber Co.  
#Georgia-Pacific  
Grant PUD Industries  
Inland Empire Paper Co.  
Intel Corp  
#International Paper  
JR Simplot  
#Kapstone Kraft Paper  
#Legacy Health  
Linde, Inc.  
Microsoft Corporation  
#Norpac Foods  
#Northwest Hardwoods  
#Packaging Corporation of America  
#PCC Structurals, Inc.  
Ponderay Newsprint  
REC Solar Grade Silicon LLC  
Schnitzer Steel  
Shell Oil Products US  
Tesoro Refining and Marketing Co.  
#Timber Products  
#Wah Chang  
WestRock  
West Linn Paper Company  
#Weyerhaeuser

*#Denotes PacifiCorp Customers*